

EXHIBIT A

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Attorneys for Defendants

UBER TECHNOLOGIES, INC.,

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

Judge: Honorable Charles Breyer

This Document Relates to:

ALL ACTIONS

**DECLARATION OF KATIE WAITZMAN
IN SUPPORT OF DEFENDANTS' JUNE
24, 2025 BRIEF IN SUPPORT OF
PRIVILEGE CLAIMS RELATING TO
BOARD OF DIRECTORS MATERIALS**

DECLARATION OF KATIE WAITZMAN

I, Katie Waitzman having personal knowledge of the following state:

1. I am the Vice President and Chief Deputy General Counsel at Uber. I was first employed by Uber in March 2015 and have worked as in-house legal counsel for the past 10 years.

My previous positions included Vice President and Deputy General Counsel; Associate General Counsel, Safety & Insurance; Head of Legal, Safety & Insurance; Global Head of Insurance Claims

DECLARATION OF KATIE WAITZMAN IN SUPPORT OF DEFENDANTS' JUNE 24, 2025

BRIEF IN SUPPORT OF PRIVILEGE CLAIMS RELATING TO BOARD OF DIRECTORS MATERIALS


Case No. 3:23-MD-3084-CRB

1 & Litigation; Legal Director, Global Insurance; and Senior Counsel, Insurance. In my current role, as
2 has been the case throughout my tenure at Uber, I am responsible for providing legal advice to Uber's
3 leadership, employees, and the Board of Directors, related to all matters including but not limited to
4 safety issues, policies, procedures, risk assessments, litigation, and policy, among other legal advice.
5 I offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies,
6 Inc., Rasier, LLC, and Rasier-CA, LLC's June 24, 2025 Brief In Support of Privilege Claims Relating
7 to Board of Directors Materials. The facts set forth herein are true and correct and are based on my
8 own personal knowledge, and I could and would competently testify thereto if called.
9

10 2. I have reviewed the document identified in the privilege log as
11 JCCP_MDL_PRIVLOG097384, and I have specifically examined page 79 of that document. Page 79
12 is a slide that is stamped "Privileged and Confidential" at the top, and it was attached to the 2018
13 Board minutes entitled "A Brief History of Safety & Insurance at Uber-Global." This slide is a
14 timeline of significant safety events at Uber that I created. As then-Head of Legal Insurance Claims &
15 Litigation, it was part of my role to advise the Safety and Insurance Team concerning various issues
16 related to safety and insurance exposure. In that role, I, and other in-house lawyers at the company,
17 created this slide based on our mental impressions, conclusions, and assessment of allegations
18 concerning safety issues in the Uber platform during various years, and the slide reflects our legal
19 judgment and impressions of the listed events through our decision to include them on the slide. We
20 prepared this slide in response to, and in anticipation of, litigation concerning safety issues and to
21 advise the board on prior and pending litigation and claims. We provided this timeline to the group
22 that prepared the Board of Directors package.
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 24, 2025.

By: 
Katie Waitzman